

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF MISSISSIPPI**

**IN RE: TANGIA A. MILLER  
DEBTOR**

**CASE NO.: 14-12161**

**MOTION OF THE DEBTOR TO INCUR NEW DEBT**

COMES NOW the Debtor, **TANGIA A. MILLER**, by and through her attorney of record, **PAULA E. DRUNGOLE**, and files this Motion to allow the Debtor to incur new debt and in support of, Debtor would show unto this Court the following, to-wit:

**I.**

The debtor, **TANGIA A. MILLER**, filed a Petition in Bankruptcy under Chapter 13 on June 6, 2014, the Northern District, Eastern Division of United States Bankruptcy Court.

**II.**

That the debtor's Bankruptcy Plan was confirmed on August 25, 2014. The term of the plan is for Sixty (60) months with 100% to unsecured creditors.

**III.**

That the wage order is in effect for a monthly obligation of \$1,472.00. That the debtors are current on all payments to the Trustee's Office.

**IV.**

That the debtor's vehicle, 2008 Cadillac STS, listed in her schedule was totaled in an accident.

**V.**

That the debtor is in dire need of a reliable vehicle so that she is able to go to her place of employment.

**VI.**

The Debtor has contacted a dealership, Toyota of Brookhaven located in Brookhaven, MS, who is willing to finance a vehicle, being a 2009 Cadillac STS. The total financed price agreed upon by all parties is in the amount of \$11,126.35 plus interest.

**VII.**

The dealership has agreed to allow the debtor to purchase the vehicle and make said payments directly to their Financial Institution upon approval of this Court.

**VIII.**

The debtor desires to enter into a security agreement with the seller and would show unto the Court that such new debt will not cause undue hardship to Debtor and will not adversely affect any other creditors.

**IX.**

**WHEREFORE**, Debtor prays that this Court allow the debtor to incur new debt for the vehicle in the amount of \$11,126.35 plus interest so that she may be able to purchase a vehicle for reliable transportation.

That the Court will allow the said amount to be paid directly to the creditor by the debtor.

Respectfully Submitted this the 24th day of July, 2018.

\s\ Paula E. Drungole  
PAULA E. DRUNGOLE

Tuesday, July 10, 2018

## Retail Breakdown

### Black Book 7/10/2018

2009 Cadillac STS Base 4.6L V8 SFI DOHC ..... \$9,575

**VIN: 1G6DZ67AX90168950  
Stock #: 89049A**

#### \*\*\* Itemized Add/Deducts \*\*\*

Power Sunroof.....	500
Chrome Wheels.....	275
Navigation System.....	200

Condition.....	Clean
Total Value without mileage.....	\$10,550
Mileage adjustment (84740) miles.....	\$1,125

\*\*\* Black Book Retail  
\$11,675

Toyota of Brookhaven - Charles Bryan

Black Book publication for Mississippi: 7/10/2018

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<b>BUYER</b>		<b>CO-BUYER</b>			
TANGIA ANN MILLER 5925 ATTALA RD 2133 FRENCH CAMP, MS 39745 Cell #: (601) 218-3959 Email:				Deal #:	19747
				Deal Type:	Retail
				Deal Date:	07/09/2018
				Print Time:	12:36pm
<b>VEHICLE</b>					
New Used Demo	Stock #: 89049A	Description: 2009 CADILLAC STS	VIN: 1G6DZ67AX90168950	Mileage: 84,740	
<b>TRADE</b>					
<b>AFTERSMARKETS</b>					
Total Aftermarkets:		\$ 0.00	Sale Price:	\$ 10,242.00	
			Total Financed Aftermarkets:	\$ 0.00	
			Total Trade Allowance:	\$ 0.00	
			Trade Difference:	\$ 10,242.00	
			Doc Fee:	\$ 345.00	
			State & Local Taxes:	\$ 529.35	
			Total License and Fees:	\$ 10.00	
			Total Cash Price:	\$ 11,126.35	
Monthly Payment:		\$323.28	Total Trade Payoff:	\$ 0.00	
Term:		60 mos.	Delivered Price:	\$ 11,126.35	
			Cash Down Payment + Deposit:	\$ 0.00	
			Sub Total:	\$ 11,126.35	
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